

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

NARESH RAJA, d/b/a AMERICA'S
BEST VALUE INN,

Plaintiffs,

v.

No. 2:17-cv-00834-JB-CG

OHIO SECURITY INSURANCE
COMPANY, LIBERTY MUTUAL
INSURANCE COMPANY, and
JEFFERY ROBINSON,

Defendants.

**JOINT MOTION TO DISMISS DEFENDANTS OHIO SECURITY INSURANCE
COMPANY, LIBERTY MUTUAL INSURANCE COMPANY, AND JEFFERY
ROBINSON WITH PREJUDICE**

Plaintiff Naresh Raja, d/b/a America's Best Value Inn, and Defendants Ohio Security Insurance Company, Liberty Mutual Insurance Company, and Jeffrey Robinson (collectively, "Liberty Mutual Defendants"), by and through their respective counsel, hereby respectfully request that the Court dismiss Plaintiff's claims against the Liberty Mutual Defendants with prejudice. As grounds for this Motion, the parties state that they have amicably resolved any and all issues between them, and no further controversies exist.

WHEREFORE, Plaintiff and the Liberty Mutual Defendants respectfully request that the Court enter its Order dismissing Plaintiff's claims against the Liberty Mutual Defendants with prejudice, with each party to bear its or his own costs.

Respectfully submitted,

RAY, McCHRISTIAN & JEANS, P.C.

By: /s/ Shannon A. Parden

Shannon A. Parden
6000 Uptown Blvd. NE #307
Albuquerque, NM 87110
Tel. 505-212-8018
sparden@rmjfirm.com
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was emailed and served through CM/ECF this 12th day of September, 2018, to the following counsel of record:

Thomas M. Furlow
FURLOW LAW FIRM, PLLC
1032 Central Parkway South
San Antonio, TX 78232
tfurlow@furlowlawfirm.com
Attorneys for Plaintiff

Milad K. Farah
GUERRA & FARAH, PLLC
1231 E. Missouri Ave.
El Paso, TX 79902
mkf@gflawoffices.com
Attorneys for Plaintiff

/s/ Shannon A. Parden
Shannon A. Parden